

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

MICHAEL POE

Plaintiff,

v.

Case No. 22-CV-0880

CITY OF MILWAUKEE,
SERGEANT CHANCE BAMBA,
OFFICER WILLIAM MAUCH,
OFFICER NORA BURLO,
OFFICER OLIVIA OHLSON,
OFFICER DANIEL SCHAEFFER, and
OFFICER JAMES TERRELL

Defendants.

UNOPPOSED MOTION TO ADJOURN PRETRIAL CONFERENCE AND TRIAL

The Defendants City of Milwaukee, Sgt. Chance Bamba, Officers William Mauch, Nora Burlo, Olivia Ohlson, Daniel Schaeffer, and James Terrell (hereinafter “the City”), by Deputy City Attorney Jennifer Williams, and Assistant City Attorney Stacy Miller, respectfully request this honorable Court to adjourn the final pretrial, and trial in this matter. Currently, the final pretrial conference is set for August 15, 2023 at 8:30 a.m., and the trial is scheduled to begin August 28, 2023 at 8:30 a.m. Furthermore, the City requests the Court find good cause to adjourn this matter for reasons set forth in greater detail herein. *See* 28 U.S.C. § 140(A).

As grounds therefor, counsel submits the following:

1. Assistant City Attorney (ACA) Stacy J. Miller entered her Notice of Appearance on this case May 16, 2023. [Dkt. # 28.]

2. Deputy City Attorney (DCA) Jennifer Williams entered her Notice of Appearance on this case May 24, 2023. [Dkt. # 30.]

3. Former ACA Christopher P. Jackson resigned from our office on May 12, 2023.

4. DCA Williams and ACA Miller were not involved in the discovery process. Due to the need to efficiently defend our clients in this matter, more time is needed to provide an adequate review of our file, discovery, claims, and defenses prior to trial.

5. Currently, the discovery to review and prepare for trial in this matter includes seven depositions totaling 399 pages, and 486 additional pages of reports and other documents.

6. In addition, six named defendants require preparation for trial testimony. In order to be efficient and prepared at trial, additional time is necessary to accomplish these tasks.

7. Both ACA Miller and DCA Williams are currently scheduled for a jury trial in federal court on July 10 – July 18, 2023, in the matter of *Benetria McGowan et al. v. City of Milwaukee* in the Eastern District of Wisconsin, Case No. 19-cv-781.

8. DCA Williams is currently scheduled, and has been actively preparing for jury trials scheduled in the months prior to the trial date in this matter before entering her appearance on this case. DCA Williams has a bench trial in state court from June 14 - 16, 2023, in the matter of *Jordan Wilson and Michael Lowe v. City of Milwaukee, et al.* in Milwaukee County Circuit Court, Case No. 21-cv-6430. She is also scheduled for a jury trial in federal court on the dates of August 14 – 16, 2023, in the matter of *Isaiah Taylor v. Justin Schwarzhuber, et al.* in the Eastern District of Wisconsin, Case No. 21-cv-600. Finally, she is scheduled for a jury trial in federal court from August 21 – 23, 2023, in the matter of *Regina Barken v. Michael Seranec, et al.*, in the Eastern District of Wisconsin, Case No. 22-cv-783.

9. On May 23, 2023 DCA Jennifer Williams spoke to Attorney Gende as a courtesy to communicate this request in advance; Attorney Gende represented he does not oppose this motion.

Therefore, for good cause shown, the defendant respectfully requests that the pretrial conference and the trial dates be adjourned.

Dated and signed at Milwaukee, Wisconsin this 26th day of May, 2023.

TEARMAN SPENCER
City Attorney

s/ Jennifer Williams
Jennifer Williams
Deputy City Attorney
State Bar No. 1058087
Stacy J. Miller
Assistant City Attorney
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